

Valli Kane & Vagnini
Attorneys at Law

600 Old Country Road
St. 519
Garden City, New York 11530

Tel: 516-203-7180
Fax: 516-706-0248
www.vkvlawyers.com

August 7, 2023

Hon. Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, New York 10007

Re: *Fischman v Mitsubishi Chemical Holdings America, Inc., et al*
Case #: 1:18-cv-08188-JMF

Dear Judge Furman:

We write on behalf of all parties in response to that portion of the Court's July 26, 2023, Order (Dkt #160) requesting a briefing schedule on any motion for sanctions. The parties are in the process of preparing an agreement which is intended to resolve all open issues. Accordingly, we respectfully request a thirty (30) day extension (September 9, 2023) of the current deadline (August 9, 2023) to submit a briefing schedule. This is the first request to extend the deadline to submit a briefing schedule.

Respectfully submitted,

VALLI KANE & VAGNINI LLP

/s/ Robert J. Valli, Jr.

Sara Wyn Kane

Robert J. Valli, Jr.

Matthew L. Berman

Attorneys for Plaintiff

600 Old Country Road, Suite 519
Garden City, New York 11530
516-203-7180

Cc: All Counsel of Record